

conveyed from Nettie R. Wood and Carrie W. Ridgeway unto Dorsey J. Griffith. A copy of this deed is attached as Exhibit II.

4. The error or omission in description is the failure to fully describe the boundaries of the property being conveyed as shown by the reverse chain of title, viz:

(a) Nettie R. Wood and Carrie W. (Wood) Ridgeway obtained title by the Last Will and Testament of their mother, Lydia A. Wood as recorded in Will Records C.E.S. 1 at page 170. (Exhibit III);

(b) Lydia A. Wood was the surviving tenant of a deed from William R. Dorsey and Ann E. Dorsey unto Isaac N. Wood and Lydia A. Wood, said deed being dated April 18, 1863, and recorded in Liber BGF 9, folio 234 of the Land Records for Frederick County, Maryland (Exhibit IV); this deed referred only to the description of property recorded in Liber BGF 8, folio 381, and contained no other description;

(c) William R. Dorsey had acquired title to said property by a deed dated March 17, 1863 (Exhibit V). This deed contained the full description for said property. However, this full description was omitted in the deed from Nettie R. Wood and Carrie W. Ridgeway unto Dorsey J. Griffith (Liber 462, folio 83) and in the deeds of subsequent owners in the chain of title down to the Plaintiffs herein.

5. A house location survey of the property was done by Harris, Smariga & Associates in February, 1987, showing what Plaintiffs believe to be the correct boundaries for their property. A copy of the survey is attached as Exhibit VI.